

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

Plaintiff,

-vs-

Criminal Action No.
21-00093-01-CR-W-GAF

DANIEL I. RAMIREZ,

Defendant.

**MEMORANDUM OF MATTERS DISCUSSED AND
ACTION TAKEN AT PRETRIAL CONFERENCE**

The following matters were discussed and action taken during the pretrial conference:

PENDING CHARGES:

- Count One – Conspiracy to Distribute Fentanyl, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846
- Count Four – Distribution of Fentanyl, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)
- Count Five – Distribution or Possession with Intent to Distribute Fentanyl within 1,000 Feet of a Public or Private School, in violation of 21 U.S.C. §§ 841(a)(1) and 860(a)
- Count Six – Possession with Intent to Distribute Fentanyl, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)
- Count Seven – Distribution or Possession with Intent to Distribute Fentanyl within 1,000 Feet of a Public or Private School, in violation of 21 U.S.C. §§ 841(a)(1) and 860(a)
- Count Eight – Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c)(a)(A)(i)

TRIAL COUNSEL:

Government: Byron Black

Case Agent: Special Agent Brett Mingee, DEA

Defense: Angela Hasty

OUTSTANDING MOTIONS: None

ANTICIPATED MOTIONS: None

TRIAL WITNESSES:

Government: 16 with stipulations; 18 without stipulations
Defense: No additional witnesses; Defendant will not testify

TRIAL EXHIBITS:

Government: 180 exhibits
Defense: No exhibits

DEFENSES:

☒ defense of general denial
☐ defenses of general denial and _____

POSSIBLE DISPOSITION:

☐ Definitely for trial ☐ Possibly for trial
☐ Motion to continue to be filed ☒ Likely a plea will be worked out

TRIAL TIME: 2 days

Government's case including jury selection: 2 days
Defense case: No additional time

STIPULATIONS:

☐ not likely
☐ not appropriate
☒ likely as to:
☐ chain of custody
☒ chemist's reports
☐ prior felony conviction
☐ interstate nexus of firearm
☒ firearm function
☒ school zone

UNUSUAL QUESTIONS OF LAW: None

FILING DEADLINES:**Witness and Exhibit Lists:**

Government: October 18, 2021
Defense: October 18, 2021

Counsel are requested to list witnesses in alphabetical order on their witness list.

Exhibit Index, Voir Dire, Jury Instructions: October 18, 2021

Jury instructions must comply with Local Rule 51.1

Motions in Limine: October 18, 2021

TRIAL SETTING: Criminal jury trial docket commencing November 1, 2021

OTHER:

- () A _____-speaking interpreter is required.
() Other assistive devices: _____

IT IS SO ORDERED.

/s/ Jill A. Morris
JILL A. MORRIS
United States Magistrate Judge